

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

_____)
SQN Capital Management, LLC)
)
)
) **Case No. 2:19-cv-1268**
)
)
Plaintiff,)
)
v.) **Judge Watson**
)
) **Magistrate Jolson**
ST Holdings, TOPCO LLC,)
)
) **MOTION FOR EXTENSION OF TIME**
and)
)
Seale A. Moorer,)
)
)
Defendants.)
)
_____)

MOTION FOR EXTENSION OF TIME

Defendants, ST Holdings, TOPCO, LLC and Seale A. Moorer (“Defendants”) by and through counsel, respectfully request twenty-one days, to and including May 22, 2019, to respond to Plaintiff’s Complaint filed herein on April 5, 2019, for reasons stated more fully below in the attached Memorandum in Support.

Respectfully submitted,

Billings & Associates

/s/ Robin L. Morrison

James R. Billings (0061836)
Robin L. Morrison (Reg No.0079489)
P.O. Box 1557
Westerville, Ohio 43086
(614) 668-6739 phone
(614) 332-0624 Phone
jrbillings@billings-law.com
robimorrison712@gmail.com

Counsel for Defendants

MEMORANDUM IN SUPPORT

Defendants respectfully request to and including May 22, 2019 to respond to Plaintiff's Complaint, served upon Defendants on or around April 10, 2019, and filed on April 2, 2019.

Defendants' counsel was recently engaged to represent both Defendants in this matter, and Defendant is currently out of the Country, and Counsel has not had an opportunity to meet with Defendants for that reason. Notably, Defendants requested a stipulation of an extension of time from Plaintiff's Counsel; Plaintiff's Counsel would agree to no more than a seven day extension of time with conditions attached to the agreed extension. Defendant is not expected to be back in the Country within that time frame. As such, an extension to respond to Plaintiff's Complaint is warranted.

Based upon the foregoing, Defendants respectfully request to and including May 22, 2019 to file a response to Plaintiff's Complaint.

Respectfully submitted,

Billings & Associates

/s/ Robin L. Morrison
James R. Billings (0081636)
Robin Jindra Morrison (0079489)
P.O. Box 1557
Westerville, Ohio 43086
(614) 668-6739
jrbillings@billings-law.com
robinmorrison712@gmail.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies, that a copy of the foregoing *Motion for Extension* was sent via the ECF system, which will send notice to counsel of record, including:

Loriann E. Fuhrer (Reg No. 0068037)

Larry J. McClatchey (Reg No. 0012191)

Counsel for Plaintiff

This 28th day of April 2019

/s/ Robin L. Morrison

Robin L. Morrison